

Message

From: Heilman, Michael [mheilman@pa.gov]
Sent: 4/25/2019 8:06:18 PM
To: Williams, Christopher [Williams.Christopher@epa.gov]
CC: Snyder, Doug [Snyder.Doug@epa.gov]; Vazquez, Natalia [Vazquez.Natalia@epa.gov]; Caballero, Kathryn [Caballero.Kathryn@epa.gov]; Augustine, Bruce [augustine.bruce@epa.gov]
Subject: RE: [External] FW: MarkWest pigging: two more questions about the First Status Report

Chris –

The May 1 slot should work for DEP.

I will either call in remotely or find another DEP lawyer to sit in.

■ MJH

Michael J. Heilman | Assistant Regional Counsel
Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive | Pittsburgh, PA 15222
Phone: 412.442.4262 | Fax: 412.442.4267
www.depweb.state.pa.us

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

From: Williams, Christopher <Williams.Christopher@epa.gov>
Sent: Wednesday, April 24, 2019 1:02 PM
To: Heilman, Michael <mheilman@pa.gov>
Cc: Snyder, Doug <Snyder.Doug@epa.gov>; Vazquez, Natalia <Vazquez.Natalia@epa.gov>; Caballero, Kathryn <Caballero.Kathryn@epa.gov>; Augustine, Bruce <augustine.bruce@epa.gov>
Subject: [External] FW: MarkWest pigging: two more questions about the First Status Report

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

Michael,

MarkWest has requested a meeting between MarkWest/Trinity and EPA/PaDEP to discuss the review of/comments for the Harmon Creek monitoring plan (see attached). Can you see if the PaDEP staff that provided input is available during the following days/times? I believe that PaDEP staff included: Ellen Davies and Nick Lazor.

April 29 1:30 - 4:00 PM EDT
May 1 9:00 – 10:00 AM EDT

Thanks,

Chris
Tel: 202.564.7889

From: Rimkus, Christopher L. <christopher.rimkus@markwest.com>
Sent: Monday, April 15, 2019 11:18 AM
To: Caballero, Kathryn <Caballero.Kathryn@epa.gov>
Cc: Williams, Christopher <Williams.Christopher@epa.gov>; Heilman, Michael <mheilman@pa.gov>; McAuliffe, Mary <mcauliffe.mary@epa.gov>; Snyder, Doug <Snyder.Doug@epa.gov>; Elmer, Mark (ENRD) <Mark.Elmer@usdoj.gov>; Fournier, Jacob R. <jrfournier@marathonpetroleum.com>; Mchale, Robert E. <robert.mchale@markwest.com>
Subject: RE: MarkWest pigging: two more questions about the First Status Report

Katherine- For your first question, residue gas means the sales quality gas leaving the facility. This gas is dry and the pipeline delivering the same does not require pigging for liquids. Rather, the line is only pigged every 5 years to test and ensure its integrity, and the launchers and receivers associated with the same are for much larger smart pigging technology that cannot accommodate a pig ramp.

To your second question, the two sites you mentioned specifically were installed prior to the effective date of the CD but after the list of sites was put together. There would be a handful of sites that fell in this category due to the timing of the two events. Because the report was a six month report, MPLX only included sites installed during that period.

From our phone conversation, MPLX has added an updated calculation sheet to address EPA's concerns. We have also included a brochure that includes a picture of the ZEVAC hooked up to a launcher or receiver as requested. Please let us know if you would like to see anything additional.

Finally, we would like to set up a brief call to discuss some of the constituents in the Harmon Creek monitoring plan with EPA, PA DEP, and MSI Trinity who is our consultant on this project. Please let us know when you have time for a brief discussion with MSI followed by a follow-up on the ZEVAC information. Hope that this find you well,

Chris

Christopher Rimkus
Assistant General Counsel - MarkWest
1515 Arapahoe, Suite 1600
Denver, CO 80202
303-925-9205 (o)
832-651-0153 (c)

From: Caballero, Kathryn <Caballero.Kathryn@epa.gov>
Sent: Wednesday, March 27, 2019 10:16 AM
To: Rimkus, Christopher L. <christopher.rimkus@markwest.com>
Cc: Williams, Christopher <Williams.Christopher@epa.gov>; Heilman, Michael <mheilman@pa.gov>; McAuliffe, Mary <mcauliffe.mary@epa.gov>; Snyder, Doug <Snyder.Doug@epa.gov>; Elmer, Mark (ENRD) <Mark.Elmer@usdoj.gov>
Subject: [EXTERNAL] MarkWest pigging: two more questions about the First Status Report

Chris, due to limited time on our call yesterday, we did not have the opportunity to ask two questions regarding information in MarkWest's First Status Report, which was submitted to EPA, DOJ and PA DEP on March 6, 2019.

First, we had a question regarding the non-installation of pig ramps at several receivers due to residue gas. In Appendix B (Existing Launcher and Receiver at Covered Facility Locations), at Redd Compressor Station, a pig ramp was not installed at the Wagers Wells 12" LP NG Lateral Receiver due to residue gas, and, in Appendix D (Existing Launcher and Receiver Pig Ramp Installations at Stand-alone Facility Locations), six high pressure sales receivers lack pig ramps because "the line contained residue gas." Please explain MarkWest's use of the term "residue gas" and the reason why pig ramps would not be installed because residue gas is present.

Second, in Appendix E (Mobile Flare Records), we did not recognize the names of several facilities because they were not sites listed in the Consent Decree appendices or in Appendix A (New Launcher and Receiver Construction. As examples, please see Dante Road- Launcher and Ferguson Receiver. Did MarkWest acquire these sites? If not, please explain why these sites were not identified in the Consent Decree appendices or Appendix A.

Can you provide us this information by Monday, April 15?

Thanks.

Kathryn Pirrotta Caballero
Senior Attorney
U.S. EPA Office of Civil Enforcement
Air Enforcement Division
(w) 202-564-1849

Mailing Address for USPS:
1200 Pennsylvania Avenue, N.W.
Mail Code 2242A
Washington, D.C. 20460

Mailing/Delivery Address for other carriers and for couriers:
1200 Pennsylvania Avenue, N.W.
Clinton Federal Building (South) Room 1147A
Washington, D.C. 20004